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Ms. Rebecca Kane  
U.S. Environmental Protection Agency  
Office of Enforcement and Compliance Assurance  
Mail Code 2222A  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Dear Ms. Kane,

As a CPA I can speak with some experience on the need for adequate disclosure. And as a regular user of Michigan rivers, and some in Kentucky and California, I have a keen interest in the ECHO project.

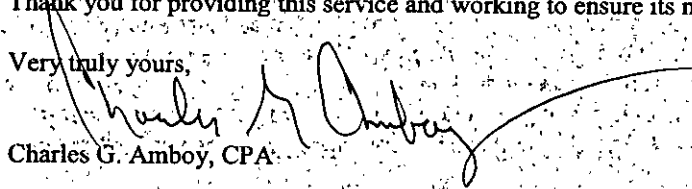
Please accept these formal comments on the Enforcement and Compliance History Online (ECHO) database, which the Environmental Protection Agency has made available to the public online. Thank you for taking this initial step to make critical data about facility performance available to the public. The availability of this information provides me and my fellow citizens with critical information regarding the sources of environmental contaminants in our communities. However, public access will benefit the regulated community as well as the public by ensuring responsibility, promoting enforceability, giving recognition to facilities that regularly comply with the law, and demanding accountability from those facilities whose actions harm surrounding communities and the general welfare. After all, releasing contaminants is a privilege, not a right.

The current pilot stage of ECHO does an excellent job of providing basic information to the public about facilities in their communities, and their potential to affect the environment and public's well-being. The benefits of the pilot system include: 1) listing how many times and at which discharge point in the last two years a facility has been in noncompliance, 2) indicating if a facility is in noncompliance in the current quarter; 3) providing valuable information on the environmental conditions of the receiving waters, and 4) using a site design that is relatively easy to navigate, including links to the "Data Dictionary" and the ability to search by facility number, name, and other parameters.

However, there are still areas in which this pilot database could be improved. Fundamentally, there is no enforcement and compliance information that should be withheld from citizen view. Please ensure that this project fully discloses all facility enforcement and compliance data; makes available data on all permit types and for as many years as the EPA has on record (not limited to the past two years); includes violation (including "minor" violation) and inspection details; is searchable country-wide; and includes information on any pending permit applications, modifications, or renewals.

Thank you for providing this service and working to ensure its maximum effectiveness.

Very truly yours,

  
Charles G. Amboy, CPA